

STATE OF MARYLAND

\* NO. C-10-CR-23-000540

V.

\* IN THE CIRCUIT COURT FOR

MICHAEL JOHN BROWN

\* FREDERICK COUNTY, MD

\* \* \* \* \*

**STATE'S DISCLOSURE WITHOUT REQUEST**

1. The State has provided to the (Defendant) or (Defense counsel) all items within Maryland Rule 4-263 and objects to any request outside Maryland Rule 4-263. The State further acknowledges its continuing duty to supplement Discovery promptly upon receipt of further discoverable information, pursuant to Maryland Rule of Procedure 4-263 (j).

2. Pages numbered 1-136.

3. Shielded version(s) of Body Worn Camera (2023-033258) pursuant to Md. Code Ann., Cts. & Jud. Proc. § 10-402 and Md. Code Ann., Pub. Safety § 3-511.

4. 83 Axon pictures sent through Evidence.com.

5. Witnesses for the State:

a. Det. David Dewees, FPD, 100 West Patrick Street, Frederick, MD 21701

b. Det. Patrick O. Wharton, FPD, 100 West Patrick Street, Frederick, MD 21701

c. Sgt. Scott Grigsby, FPD, 100 West Patrick Street, Frederick, 21701

d. Det. Kyle Jones, FPD, 100 West Patrick Street, Frederick, MD 21701


e. Ofc. Johnathan Schultz, FPD, 100 West Patrick Street, Frederick, MD 21701

f. Det. Kyrie Yackovich, FPD, 100 West Patrick Street, Frederick, MD 21701

g. Special Agent Jeff Yesensky, FBI Task Force, 185 Admiral Cochrane Drive,  
Annapolis, MD 21401

h. Det. Rebecca Skelly, FPD, 100 West Patrick Street, Frederick, MD 21701

6. Pursuant to Maryland Rule 4-263(d)(7)(B), the State is required to disclose copies of the written policies relating to pretrial eyewitness identification involving participation by personnel from the local law enforcement agencies. The State hereby discloses the policies of Frederick Police Department for the above captioned case. The State acknowledges its continuing duty of disclosure.

  
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ASSISTANT STATE'S ATTORNEY  
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100 West Patrick Street  
Frederick, Maryland 21701  
301-600-1523  
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FrederickSAOCircuit@FrederickCountyMD.gov

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 11th day of July, 2023, a copy of the foregoing State's Disclosure Without Request was sent via MDEC, a bulk download link via evidence.com and/or Citrix, a secure file sharing service, to the designated e-mail address and/or service contact for Linda Zeit, Esquire, Attorney for Defendant herein.

  
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JOYCE R. KING  
ASSISTANT STATE'S ATTORNEY